

EXHIBIT B

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10 KALMAN ISAACS, individually and on
11 behalf of all others similar situated,

12 Plaintiff,

13 v.

14 ELON MUSK and TESLA, INC.,

15 Defendants.
16

Case No.: 3:18-cv-04865-EMC

**DECLARATION OF ALAN DAVIDSON IN
FURTHER SUPPORT OF THE MOTION
OF TEMPUS INTERNATIONAL FUND
SPC AND OPPORTUNITY UNIQUE FUND
INC.'S MOTION FOR (1)
CONSOLIDATION OF RELATED
ACTIONS; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF
THEIR CHOICE OF LEAD COUNSEL**

17 [Additional Captions Omitted]
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1 I, Alan Davidson, declare the following under penalty of perjury under the laws of the
2 United States of America and pursuant to 28 U.S.C § 1746 as follows:

3 1. I am currently a member of the board of directors of Opportunity Unique Fund Inc.
4 ("OUF").

5 2. The other member of OUFG's board is Ian McConnell.

6 3. By Section 2.2 (r) of the Investment Manager Agreement dated November 28, 2014
7 between OUFG and Opportunity Gestão Internacional De Recursos Ltda. (now known as Opportunity
8 Gestão de Investimentos e Recursos Ltda. ("Opportunity"), Opportunity, as investment manager, is
9 authorized to bring lawsuits on behalf of OUFG.

10 4. I have personal knowledge that Opportunity sought lead plaintiff status for OUFG on
11 October 9, 2018 and I hereby ratify such action.

12 Dated: October 30, 2018



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14 Alan Davidson
15 Director of Opportunity Unique Fund Inc.
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